Intel Government Affairs 1634 I Street, NW #300 Washington, DC 20006 (202) 628-3838 Fax (202) 628-2525



January 21, 1999



## **VIA HAND DELIVERY**

Magalie Roman Salas, Esq. Secretary Federal Communications Commission 1919 M Street, N.W., Washington, DC 20554

Re: Deployment of Wireline Services Offering Advanced Telecommunications Capability, CC Dkt. No. 98-147;

## Notice of Oral and Written Ex Parte Presentation

Dear Ms. Salas:

On Tuesday, January 19, 1999, Ken Cancilla, Kevin Kahn and Peter Pitsch of Intel spoke with Robert Pepper, Stagg Newman and Douglas Sicker. During that meeting the discussion primarily dealt with the development and status of the G.Lite standard for DSL. The attached handout was presented.

In the course of that discussion the feasibility of "line sharing" or "spectrum unbundling" was considered. Kevin Kahn stated that line sharing is technically feasible. However, he explained that Intel had significant operational concerns about line sharing unless there is a single point of contact to resolve customer questions about interference that might arise.

Also, the discussion considered Intel's support for the agreement it reached with various telephone companies on regulatory principles designed to promote deployment of advanced telecommunications services, the

importance of enabling CLEC competition by giving CLECs appropriate access to essential facilities and the importance of assuring that ILECs have strong incentives to deploy advanced telecommunications services by avoiding the imposition of unnecessary regulation. In particular, Pitsch discussed the importance of adopting reasonable terms of separation for the separate affiliate (such as those in 47 CFR 20.20) and the benefits of not imposing unbundling regulation for advanced services electronics on an ILEC offering service on an integrated basis as long as the ILEC complies with the FCC's new rules regarding collocation and loop provisioning.

Pursuant to Section 1.1206(b) of the Commission's Rules, an original and one copy of this letter are being submitted to the Secretary's Office and a copy is being provided to each of the above referenced FCC personnel. Please inform me if any questions should arise in connection with this filing.

Respectfully submitted,

Peter K. Pitsch

cc: Robert Pepper Stagg Newman

Douglas Sicker

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EX PARTE OR LATE FILED



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